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15 Attorneys for Defendant  
16 GOOGLE LLC

17 UNITED STATES DISTRICT COURT  
18 NORTHERN DISTRICT OF CALIFORNIA

19 ANIBAL RODRIGUEZ, *et al.* individually and on  
20 behalf of all others similarly situated,

21 Plaintiff,

22 v.  
23 GOOGLE LLC, *et al.*,

24 Defendant.

25 Case No. 3:20-CV-04688 RS  
**DECLARATION OF EDUARDO E.**  
**SANTACANA IN SUPPORT OF**  
**GOOGLE LLC'S MOTION TO**  
**EXCLUDE PLAINTIFFS' EXPERT**  
**OPINION OF BRUCE SCHNEIER**

26 Date: May 15, 2025  
27 Time: 1:30 p.m.  
28 Courtroom: 3, 17th Floor  
Judge: Hon. Richard Seeborg

Action Filed: July 14, 2020  
Trial Date: August 18, 2025

1 I, Eduardo E. Santacana, declare:

2 1. I am an attorney licensed to practice law in the State of California and am a partner  
 3 with the law firm of Willkie Farr & Gallagher LLP, located at 333 Bush Street, 34<sup>th</sup> Floor, San  
 4 Francisco, California 94104, counsel for Defendant Google LLC (“Google”) in the above-captioned  
 5 action. Unless otherwise stated, the facts I set forth in this declaration are based on my personal  
 6 knowledge or knowledge I obtained through my review of corporate records or other investigation. If  
 7 called to testify as a witness, I could and would testify competently to such facts under oath.

8 2. I submit this declaration in support of Google’s Motion to Exclude Bruce Schneier filed  
 9 herewith.

10 3. Attached hereto as **Exhibit 1** is a true and correct copy of the Expert Report of Bruce  
 11 Schneier, submitted by Plaintiffs in the above-captioned matter on February 20, 2023, previously  
 12 filed as Dkt. 361–57.

13 4. Attached hereto as **Exhibit 2** is a true and correct copy of relevant excerpts of the  
 14 transcript of the deposition of Bruce Schneier, taken on July 10, 2023.

15 5. Attached hereto as **Exhibit 3** is a true and correct copy of the Supplemental Report of  
 16 Bruce Schneier, submitted by Plaintiffs in the above-captioned matter on January 6, 2025.

17 I declare under penalty of perjury under the laws of the United States that the foregoing is true  
 18 and correct.

19  
 20 Dated: April 3, 2025

*/s/ Eduardo E. Santacana*

Eduardo E. Santacana

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